

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MONIS IRFAN,

Defendant.

)
) Case No. 1:19-CR-120

) Count 1: 18 U.S.C. § 2422(b)
) Attempted Coercion and Enticement
) of a Minor

) Count 2: 18 U.S.C. § 2252(a)(2) & (b)(1)
) Receipt of Child Pornography

) Count 3: 18 U.S.C. § 2252(a)(2) & (b)(1)
) Distribution of Child Pornography

) Count 4: 18 U.S.C. § 2252(a)(4)(B) & (b)(2)
) Possession of Child Pornography

) Count 5: 18 U.S.C. § 2252(a)(1) & (b)(1)
) Transportation of Child Pornography

) Forfeiture Notice: 18 U.S.C. § 2253(a)
)



INDICTMENT

April 2019 Term – at Alexandria, Virginia

COUNT ONE
(Attempted Coercion and Enticement of a Minor)

THE GRAND JURY CHARGES THAT:

Between in or about January 2019 and in or about February 2019, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, MONIS IRFAN, used a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Section 18.2-61 of the Code of Virginia (rape of child under 13 years of age), Section 18.2-67.1 of the Code of Virginia (forcible sodomy of child under 13 years of age), Section 18.2-67.3 of the Code of Virginia (aggravated sexual battery of child under 13 years of age), and Section 18.2-370 of the Code of Virginia (taking indecent liberties with children).

(In violation of Title 18, United States Code, Section 2422(b).)

COUNT TWO
(Receipt of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2019, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, MONIS IRFAN, knowingly received and attempted to receive one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, to wit: digital videos depicting a minor engaged in sexually explicit conduct received using a Samsung Galaxy S9 cellphone.

(In violation of Title 18, United States Code, Section 2252(a)(2) & (b)(1).)

COUNT THREE
(Distribution of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 3, 2019, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, MONIS IRFAN, knowingly distributed and attempted to distribute one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, to wit: a digital video depicting a minor engaged in sexually explicit conduct distributed using a Samsung Galaxy S9 cellphone.

(In violation of Title 18, United States Code, Section 2252(a)(2) & (b)(1).)

COUNT FOUR
(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

From in or about July 2018 to in or about February 2019, in Fairfax County, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant, MONIS IRFAN, knowingly possessed and attempted to possess at least one matter containing one or more visual depictions that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which visual depictions were produced using materials which had been mailed and so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: digital videos and images, distinct from those referred to in Counts 2 and 3, depicting minors engaged in sexually explicit conduct saved on a Samsung Galaxy S9 cellphone.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B) & (b)(2).)

COUNT FIVE
(Transportation of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

Between in or about July 2018 and in or about August 2018, within the Eastern District of Virginia and elsewhere, the defendant, MONIS IRFAN, knowingly transported and shipped one or more visual depictions using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, to wit: digital videos depicting minors engaged in sexually explicit conduct that were contained in a computer folder titled "monisirfan1\Downloads" on a Macbook Air laptop computer.

(In violation of Title 18, United States Code, Section 2252(a)(1) and (b)(1).)

FORFEITURE NOTICE

THE GRAND JURY HEREBY FINDS THAT:

The defendant, MONIS IRFAN, upon conviction on any Count of this Indictment, and as part of the defendant's sentencing under Federal Rule of Criminal Procedure 32.2, shall forfeit to the United States any and all matters that contain visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property, real or personal, constituting or traceable to any proceeds the defendant obtained from the above violations; and any property, real or personal, used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including:

1. A Samsung Galaxy S9 (IMEI: 353302090639892); and
2. A MacBook Air (S/N: C02S71PSH3QD).

(In accordance with Title 18, United States Code, Sections 2253 and 2428.)

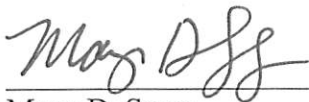
A TRUE BILL

Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:



Maya D. Song
Assistant United States Attorney
William G. Clayman
Special Assistant United States Attorney (LT)